

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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RM-1141

In Re:

Justice Watts

Case No. 19-28370JNP

Judge:

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

X TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following **(choose one)**:

1. _____ Motion for Relief from the Automatic Stay filed by _____, creditor. A hearing has been scheduled for _____, at _____ a.m.

OR

_____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for _____ at _____ a.m.

OR

_____ Certification of Default filed by _____, creditor. I am requesting that a hearing be scheduled on this matter.

OR

X Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other:

The trustee's notes reflect the following.

#17 TCOD LP 7/24/24 A=\$2905. Debtor is in the 59th month w/ balance of \$4233

However, based on the following, the debtor is current through and including July 2024. The debtor only owes his August 2024 trustee payment in the amount of \$1,328.00, minus various over payments.

Below is a detailed explanation of the court ordered change in payments as compared to the debtor's trustee payments. The proof of the debtor's payments are reflected on the "NationalDataCenter" website:

On 4.27.2020, the court entered a stipulation changing payments to 1,238 for 53 months.

On 4.17.2023, the court entered an order vacating the dismissal order that required an immediate \$9,400 payment to bring his payments current.

Thereafter, the debtor made the following payments:

Payment of \$9,400 on 4/18/2024;

Payment of \$1,249 on 5/1/2023;

Payment of \$1,249 on 6/12/2023;

Payment of \$1,249 on 7/12/2023

On 7/14/2023, the court entered an order granting a fee application that changed the monthly trustee payments to \$1,328.00.

Thereafter, the debtor made the following payments:

Payment of \$1,328 on 8/17/2023;

Payment of \$1,328 on 9/18/2023;

Payment of \$1,328 on 10/17/2023;

Payment of \$1,328 on 11/17/2023;

Payment of \$1,328 on 12/18/2023;

Payment of \$1,328 on 1/18/2024;

Payment of \$1,328 on 2/20/2024;

Payment of \$1,328 on 3/18/2024;

Payment of \$1,328 on 4/17/2024;

Payment of \$1,328 on 5/17/2024;

Payment of \$1,328 on 6/25/2024;

Payment of \$1,328 on 7/24/2024;

Also, it appears that the only creditors that have not been paid are the unsecured creditors.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I Robert Manchel, Esq. debtor's attorney, certify under penalty of perjury that the foregoing is true and correct.

Date: 8/12/2023

/s/Robert Manchel, Esq.
Robert Manchel, Debtor's Attorney